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8  
9 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2008-342

13 SUSAN VERMEULEN JAMISON,  
a.k.a. SUSAN JAMISON,  
14 a.k.a. SUSAN LOUISE JAMISON,  
a.k.a. SUSAN LOUISE VERMEULEN  
15 1804 Henry Court  
Ripon, CA 95366

**A C C U S A T I O N**

16 Registered Nurse License No. 227576

17 Respondent.  
18

19 Complainant alleges:

20 **PARTIES**

21 1. Ruth Ann Terry, M.P.H., R.N. ("Complainant") brings this Accusation  
22 solely in her official capacity as the Executive Officer of the Board of Registered Nursing  
23 ("Board"), Department of Consumer Affairs.

24 2. On or about July 31, 1972, the Board issued Registered Nurse License  
25 Number 227576 to Susan Vermeulen Jamison, also known as Susan Jamison, Susan Louise  
26 Jamison, and Susan Louise Vermeulen ("Respondent"). Respondent's registered nurse license  
27 was in full force and effect at all times relevant to the charges brought herein and will expire on  
28 March 31, 2010, unless renewed.

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1                   7.     Health and Safety Code section 11173, subdivision (a), states, in pertinent  
2 part:

3                   No person shall obtain or attempt to obtain controlled substances, or  
4 procure or attempt to procure the administration of or prescription for controlled  
substances, (1) by fraud, deceit, misrepresentation, or subterfuge . . .

5                   **Cost Recovery**

6                   8.     Code section 125.3 provides, in pertinent part, that the Board may request  
7 the administrative law judge to direct a licentiate found to have committed a violation or  
8 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation  
9 and enforcement of the case.

10                  **CONTROLLED SUBSTANCES AT ISSUE**

11                  9.     "Demerol" is a brand of meperidine hydrochloride, a derivative of  
12 pethidine, and a Schedule II controlled substance as designated by Health and Safety Code  
13 section 11055, subdivision (c)(17).

14                  10.    "Vicodin" is a compound consisting of 5 mg hydrocodone bitartrate, also  
15 known as dihydrocodeinone, and 500 mg acetaminophen per tablet, and is a Schedule III  
16 controlled substance as designated by Health and Safety Code section 11056, subdivision (e)(4).

17                  **FIRST CAUSE FOR DISCIPLINE**

18                  **(Diversion and Self-Administration of Controlled Substances)**

19                  11.    Respondent is subject to disciplinary action pursuant to Code section  
20 2761, subdivision (a), on the grounds of unprofessional conduct, as defined by Code section  
21 2762, subdivision (a), in that in and between early 2001 and July 2002, while licensed as a  
22 registered nurse and/or employed as a registered nurse in the Post Anesthesia Care Unit at  
23 Doctors' Medical Center, Modesto, California, Respondent did the following:

24                  **Diversion of Controlled Substances:**

25                  a.     During the time period indicated above and while on duty as a registered  
26 nurse at Doctors' Medical Center, Respondent obtained the controlled substance Demerol by  
27 fraud, deceit, misrepresentation, or subterfuge, in violation of Health and Safety Code section

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1 11173, subdivision (a), by diverting or taking unknown quantities of Demerol from the hospital  
2 supply for her own personal use.

3 **Self-Administration of Controlled Substances:**

4 b. During the time period indicated above, Respondent self-administered the  
5 controlled substance Demerol without lawful authority therefor, as more particularly set forth in  
6 paragraph 13 below.

7 **SECOND CAUSE FOR DISCIPLINE**

8 **(Use of Controlled Substances to an Extent or in a Manner**

9 **Dangerous or Injurious to Oneself or Others)**

10 12. Respondent is subject to disciplinary action pursuant to Code section  
11 2761, subdivision (a), on the grounds of unprofessional conduct, as defined by Code section  
12 2762, subdivision (b), in that in and between 1996 and August 2002, while licensed as a  
13 registered nurse and/or employed or on duty as a registered nurse at Doctors' Medical Center,  
14 Modesto, California, Respondent used the controlled substances Demerol and Vicodin to an  
15 extent or in a manner dangerous or injurious to herself and/or others, as follows: During the time  
16 period indicated above, Respondent took prescription Vicodin on a daily basis. Respondent  
17 initially used Vicodin for pain, then began using it to medicate her mood. Respondent also took  
18 Vicodin to maintain her energy level while at work. Respondent's use of Vicodin progressed to  
19 the point where she began diverting Demerol at work. From approximately 2001 through July  
20 2002, Respondent diverted Demerol and used the medication intramuscularly two or more times  
21 per week.

22 **PRAYER**

23 WHEREFORE, Complainant requests that a hearing be held on the matters herein  
24 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:


25 1. Revoking or suspending Registered Nurse License Number 227576, issued  
26 to Susan Vermeulen Jamison, also known as Susan Jamison, Susan Louise Jamison, and Susan  
27 Louise Vermeulen;

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1                   2.       Ordering Susan Vermeulen Jamison, also known as Susan Jamison, Susan  
2 Louise Jamison, and Susan Louise Vermeulen, to pay the Board of Registered Nursing the  
3 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
4 Professions Code section 125.3;

5                   3.       Taking such other and further action as deemed necessary and proper.

6  
7 DATED: 6/6/08.

8   
9 RUTH ANN TERRY, M.P.H., R.N.  
10 Executive Officer  
11 Board of Registered Nursing  
12 Department of Consumer Affairs  
13 State of California

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18 Complainant

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